

Superfund Site Assessment Team – Position Justification

- At the 2014 reorganization 5 SAMs -- currently staffing is 3.25 with 0.25 being detail from remedial. Three permanent staff or down 40% from intended staffing levels.
- New Priority work for FY 16 not anticipated:
 - Supporting NPL listing discussions and HRS package for Upper Animas mining district;
 - Coordination efforts on mine assessments in general – coordinating with States, FLMAs, and HQ; This work will displace other site assessment work in Utah and Montana and Colorado.
 - Providing comments on Final Pavilion report that is well past original due date.
- Priority work for FY 16 we can't support:
 - Responding to comments on the March 2015, NPL proposal of CFAC to allow finalizing on the NPL.
 - Any site assessment work in Montana including at the Phillipsburg mining district, a mining district with significant impacts to water quality.
 - Screening "other sites" identified in Tronox Settlement
 - Making significant progress on initiating a mixed ownership mine site program in Utah. We can support an initial information exchange meeting but will not be able to provide sustained staffing to move it forward.
 - Supporting Uinta Basin oil and gas multimedia/multiprogram assessment.
- Other important work not being supported at this time is following up on high risk sites with potential vapor intrusion concerns or working with Utah to develop a strategy to investigate sites that pose a threat to the aquifers that supply 60% of the Wasatch fronts drinking water supply. In addition, the region is no longer performing new discovery efforts to identify sites posing significant health and/or environmental risks. Discovery efforts are a primary mechanism to identify priority/high threat Superfund work.
- The VI proposed rule set to be published this winter and will add a significant work load. Even without the rule going final, these are high risk sites that require follow up and engagement in excess of what can currently be resourced.
- SAMs are currently active at 90 sites (both EPA and State lead) or in other words 25 to 26 sites/SAM. Some of these sites are easier assessments or reviewing the State but some are as complex as a remedial or removal with high community interest, unique technical considerations, PRP interaction/enforcement. There are sites with significant impacts that don't move forward without EPA staff/management

investment as States often reluctant to resolve issues (Ferris Haggerty, DFT mine sites, Utah mixed ownership mine sites)

- Currently no SAM assigned to Colorado -- instead the team leader is the primary contact for policy and budget issues and some technical review. The Program is falling behind on report review – in some instances, it is taking a 2 years for final EPA decisions to be made on completed PA/SI reports – Manitou Springs example.
- Limited capacity to engage at a new NPL caliper site – these sites come from multiple venues and the opportunities are largely outside EPA's control -- it's high intensity work load that is very time sensitive (examples include Upper Animas, CFAC, SLC VA hospital, SLC Sugar House PCE, Park City)– and it is important to be able to react. Due to high community interest in these sites, this site work displaces other site assessment activities.
- Already disinvested in most pre-remedial efforts at Federal Facilities sites except in very limited instances and have divested in Federal Facility Docket sites except for conducting mandatory notifications.